

EXPARTE MOTION
DENNIS B JONES, PRO SE
8665 WEST FLAMINGO ROAD
#131-417
LAS VEGAS, NV 89147
816-399-4937 (this week)

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AND FILED

SEP 14 12 54 PM '10

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA
U.S. BANKRUPTCY COURT
MARY A. SULLIVAN, CLERK

RE: JONES DENNIS B)
) BKS-10-22461-BAM
) Chapter 13
)

**EXPARTE MOTION TO AUTHORIZE SALE OF PROPERTY AND MOTION TO ALLOW STAY OF FORECLOSURE
UNTIL PROPERTY CLOSES AND CREDITORS ARE PAID IN FULL**

COMES NOW DEBTOR, PRO SE, with the motion for authorization to sell the property located at 1209 Kokopelli, Edinburg, Texas at the price that allows the payoff of the Creditor at 100% of the loan. In addition, Debtor requests that the Court Stop all Foreclosure action against this property to allow the sale to close.
The reasons for these Motions are as follows:

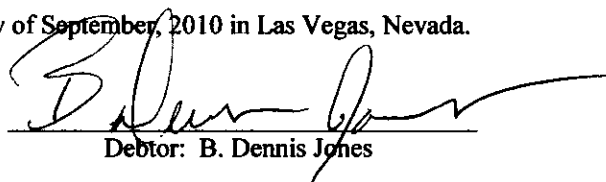
1. Property is under sales contract and requires the Court approval to finalize the closing of the property.
2. Property is occupied by the buyers who are in escrow and they are making the post petition payment until closing can be approved.
- 3 The property is insured by National Lloyds of London, and has the appropriate coverage required. This insurance is paid through the escrow account held by the Lender/Creditor.
4. All payments including the Post Petition payments have and will continue to be made on the property prior to closing.
5. The Creditor must approve the final HUD 1 statement before the sale can close and accept it.
5. The order can be signed now and it also allows for anyone to contest it within 30 days. There is no need for anyone to contest the action since it allows for the full payment of Creditors.

Therefore, Debtor respectfully requests the Exparte Motion to be so ordered with a copy being sent to Debtor at the address above.

I declare under perjury under the laws of the State of Nevada that the foregoing is true and correct.

Filed with the Clerk of Courts on this 7th day of September, 2010 in Las Vegas, Nevada.

Dated: September 7, 2010


Debtor: B. Dennis Jones